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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

JORDAN DEPPE, Deceased, by and through his  
Successor in Interest, MICHAEL DEPPE; and  
MICHAEL DEPPE, Individually,

Plaintiff,

vs.

SHASTA COUNTY, a public entity; SHASTA  
COUNTY SHERIFF-CORONER ERIC MAGRINI,  
in his individual capacity; CAPTAIN GENE  
RANDALL; WELLPATH INC., a Delaware  
corporation; WELLPATH MANAGEMENT, INC.,  
a Delaware Corporation; WELLPATH LLC, a  
Delaware Limited Liability Company;  
CALIFORNIA FORENSIC MEDICAL GROUP,  
INC., a California Corporation; SANAZ PARSA,  
M.D.; TRACI LEWIS, L.M.F.T; SHEA PHINNEY,  
L.M.F.T.; DANIEL DELLWO, P.A.; and DOES 1–  
20; individually, jointly and severally,

Defendants.

Case No. 2:22-cv-00187-TLN-JDP

**STIPULATION AND ORDER TO  
MODIFY SCHEDULING ORDER  
(Doc. 5)**

1 Pursuant to the Court's instruction on May 20, 2022, after the parties filed their Joint Case  
2 Management Statement (Doc. 17), the parties hereby stipulate and agree to modify the Scheduling  
3 Order in this matter (Doc. 5) as follows:

4  
5 1. This is a civil rights wrongful death/survival action arising from allegations of the  
6 Defendants' deliberate indifference to the serious medical and mental health needs of pretrial  
7 detainee, Jordan Deppe, resulting in his suicide on January 7, 2021, at the Shasta County jail, with a  
8 date of death of January 8, 2021.

9  
10 2. This case involves a large number of participants, including six currently known  
11 individual defendants and five entity defendants, represented by three sets of counsel. Based on the  
12 complexities of the issues presented, the number of parties, records involved, and anticipated  
13 depositions, an additional amount of time is needed to accommodate the schedules of all parties and  
14 deponents, to allow for the completion of discovery and expert disclosures, to allow the experts time  
15 to complete their review of deposition transcripts before writing their reports, and to allow sufficient  
16 time for pretrial preparation.

17  
18 3. While all parties have agreed that the proposed modifications will allow the parties  
19 additional time to adequately prepare for trial, the parties are mindful of the overcrowded Eastern  
20 District docket, the demands placed on Eastern District judges, and the Court's limited resources,  
21 especially during this pandemic. The parties are represented by experienced counsel who have  
22 worked together before, sometimes on many cases, and will continue to work cooperatively  
23 together, and in an orderly fashion, and believe that they will complete all necessary discovery and  
24 pretrial matters with this extension of the deadlines.

4. The parties therefor stipulate to an extension of the dates in this matter. The modification of the discovery, dispositive motion, and pretrial dates, as requested in the parties' Joint Case Management Statement (Doc. 17), would move dates as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Close of Fact Discovery	December 28, 2022	June 30, 2023
Expert Disclosures due	February 24, 2023	August 25, 2023
Rebuttal Expert Disclosures	March 28, 2023	September 29, 2023
Close of Expert Discovery	<i>Counsel are instructed to complete all discovery of expert witnesses in a timely manner in order to comply with the Court's deadline for filing dispositive motions.</i>	October 27, 2023
Dispositive Motion filing deadline	January 26, 2023	July 27, 2023
Joint Notice of Trial Readiness	April 27, 2023	October 27, 2023

For the foregoing reasons, the parties respectfully request that this Court enter an order extending the discovery, dispositive motion, and pretrial dates in this case as set forth above, and pursuant to the parties' Joint Case Management Statement.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: May 31, 2022

HADDAD & SHERWIN LLP

*/s/ Teresa Allen*

TERESA ALLEN  
Attorneys for Plaintiff

1 Dated: May 31, 2022

MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP

3  
4 /s/ Lynn L. Carpenter

5 MILDRED K. O'LINN  
6 LYNN L. CARPENTER  
7 KAYLEIGH A. ANDERSEN  
8 Attorneys for Defendants  
9 SHASTA COUNTY, SHERIFF-CORONER ERIC  
10 MAGRINI, and CAPTAIN GENE RANDALL

11 Dated: May 31, 2022

BERTLING LAW GROUP, INC.

12 /s/ Jemma Parker Saunders

13 PETER BERTLING  
14 JEMMA PARKER SAUNDERS  
15 Attorneys for Defendants  
16 WELLPATH INC., WELLPATH MANAGEMENT,  
17 INC., WELLPATH LLC, CALIFORNIA FORENSIC  
18 MEDICAL GROUP INC., TRACY LEWIS, L.M.F.T.,  
19 SHEA PHINNEY, L.M.F.T., and DANIEL DELLWO,  
20 P.A.

21 Dated: May 31, 2022

LAURIA TOKUNAGA GATES & LINN, LLP

22 /s/ Anthony Lauria

23 ANTHONY LAURIA  
24 Attorneys for Defendant SANAZ PARSA, M.D.

**ORDER**

Based on the parties' stipulation, and with good cause appearing,

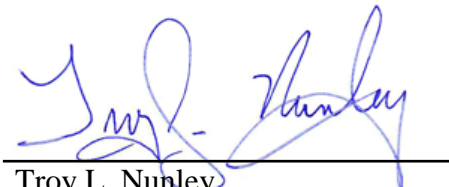
IT IS HEREBY ORDERED that the Pretrial Scheduling Order (Doc. 5) is modified as follows:

<b><u>Event</u></b>	<b><u>Current Date</u></b>	<b><u>New Date</u></b>
Close of Fact Discovery	December 28, 2022	June 30, 2023
Expert Disclosures due	February 24, 2023	August 25, 2023
Rebuttal Expert Disclosures	March 28, 2023	September 29, 2023
Close of Expert Discovery	<i>Counsel are instructed to complete all discovery of expert witnesses in a timely manner in order to comply with the Court's deadline for filing dispositive motions.</i>	October 27, 2023
Dispositive Motion filing deadline	January 26, 2023	<b>November 27, 2023</b>
Joint Notice of Trial Readiness	April 27, 2023	October 27, 2023

All other dates set forth in Doc. No. 5 will remain the same.

IT IS SO ORDERED.

Dated: June 1, 2022

  
Troy L. Nunley  
United States District Judge